

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$25,490.00 IN UNITED
STATES CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Bridget J. Schoenborn, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit property to the United States of America, under 21 U.S.C. § 881(a)(6), for violations of 21 U.S.C. § 841(a)(1).

The Defendant In Rem

2. The defendant property, approximately \$25,490.00 in United States currency, was seized on or about April 27, 2023, from Richard Mynor and Zashamonique Cain-Carter at or near 6XXX W. Bradley Road, Milwaukee, Wisconsin.

3. The defendant property is presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin.

Jurisdiction and Venue

4. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

6. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred, at least in part, in this district.

Basis for Forfeiture

7. The defendant property, approximately \$25,490.00 in United States currency, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

Facts

8. Marijuana is a Schedule I controlled substance under 21 U.S.C. § 812.

9. Cocaine is a Schedule II controlled substance under 21 U.S.C. § 812.

10. Fentanyl is a Schedule II controlled substance under 21 U.S.C. § 812.

11. Methamphetamine is a Schedule II and III controlled substance under 21 U.S.C. § 812.

April 27, 2023 execution of search warrant at Richard Mynor's residence, 6XXX W. Bradley Road, Milwaukee, Wisconsin

12. On April 27, 2023, officers executed a search warrant at the residence of Richard Mynor and Zashamonique Cain-Carter at or near 6XXX W. Bradley Road, Milwaukee, Wisconsin (the “Bradley Road residence”).

13. Present during execution of the warrant were Richard Mynor, Zashamonique Cain-Carter, and two minor children.

14. The following items, among other things, were inside the Bradley Road residence:

- A. Inside two coolers underneath the basement steps were a total of approximately 17 kilogram-sized pressed bricks of powder cocaine wrapped in plastic wrap and having a total weight of approximately 18,136 grams of cocaine with packaging.
- B. In the northwest upper bedroom was a total of approximately \$25,490.00 in United States currency, which was in the following locations:
 - i. Approximately \$10,000 in a dresser drawer.
 - ii. Approximately \$10,840 inside a shoe box in the closet.
 - iii. Approximately \$4,000 on the top shelf of the closet.
 - iv. Approximately \$506 in the front right pocket of jeans on top of a dresser. Richard Mynor's wallet was also located in the same pair of jeans.
 - v. Approximately \$144 in a black purse underneath the bed.
- C. A loaded Ruger handgun was in the northwest upper bedroom closet.
- D. Approximately 56 rounds of ammunition on the basement floor.

15. A drug detection canine gave a positive alert to the odor of a controlled substance on the approximately \$25,490.00 in United States currency.

April 27, 2023 execution of search warrant at a residence associated with Richard Mynor, 2XXX N. 38th Street, Milwaukee, Wisconsin

16. On April 27, 2023, officers executed a search warrant at a residence associated with Richard Mynor, 2XXX N. 38th Street, Milwaukee, Wisconsin (the "38th Street residence").

- 17. No one was present during execution of the search warrant.
- 18. The following items, among other things, were inside the 38th Street residence:

- A. Approximately 2,930 grams of cocaine.
- B. Approximately 170 grams of cocaine base.
- C. Approximately 38 grams of fentanyl.

- D. Approximately 13 grams of methamphetamine.
- E. Approximately 1,125 grams of marijuana.
- F. Approximately 10 pounds of lactose and one bottle of quinine.¹
- G. A money counter.
- H. Three digital scales.
- I. Three loaded and chambered firearms.
- J. Approximately \$7,000.00 in United States currency.²

April 27, 2023 Mirandized recorded interview of Richard Mynor

- 19. On April 27, 2023, officers conducted an interview of Richard Mynor.
- 20. The interview was audio and video recorded.
- 21. Prior to conducting the interview, an officer read Richard Mynor his Constitutional Miranda Rights. Mynor stated that he understood each of his rights and was willing to speak with officers.
- 22. During the interview, Richard Mynor (“Mynor”) admitted the following:
 - A. Mynor admitted conducting three or four transactions over the past year and during each transaction he purchased six to eight kilograms of cocaine from his Chicago source.
 - B. Mynor’s last purchase of cocaine from his Chicago source was about one month ago.
 - C. Mynor paid approximately \$120,000 for six kilograms of cocaine and approximately \$160,000 for eight kilograms of cocaine.
 - D. Mynor purchased pound quantities of marijuana from a different source.
 - E. Mynor charged his customers \$700 to \$800 per ounce for cocaine.
 - F. Mynor has cocaine customers from Marshfield, Wisconsin, and Madison, Wisconsin.
 - G. Officers showed Mynor a photograph of an individual having the initials M.J. Mynor identified M.J. as Mynor’s customer from Madison, Wisconsin, who purchased ecstasy and cocaine from Mynor.

¹ Lactose and quinine are used by drug dealers to cut or dilute controlled substances.

² The approximately \$7,000 is not part of the defendant currency in this case.

- i. Mynor stated that M.J. purchased ecstasy for 80 cents per unit from Mynor four to five days ago at Mynor's residence on 38th Street.
- ii. Mynor stated that M.J. typically purchased at least five-ounce quantities of cocaine per transaction from Mynor.

April 27, 2023 recorded statement of Zashamonique Cain-Carter

23. On April 27, 2023, officers conducted an interview of Zashamonique Cain-Carter at the Bradley Road residence.

24. The interview was audio recorded.

25. During the interview, Zashamonique Cain-Carter ("Cain-Carter") stated the following:

- A. Cain-Carter stated that there was \$10,000 in a dresser drawer in the bedroom and all of that money was accumulated from tax returns in 2019 or 2020, through her 2022 return.
- B. Cain-Carter stated that she did not own any other money in the residence other than a small amount in her purse. When asked about other money located in the Bradley Road residence, Cain-Carter stated that she did not know of any other large sums of money in the Bradley Road residence.
- C. Cain-Carter stated that she could provide bank statements showing the IRS deposits and her subsequent withdrawal.
- D. Cain-Carter stated that she withdrew all \$10,000 in one lump sum in or around March 2023.

Administrative Forfeiture Proceedings

26. The Drug Enforcement Administration ("DEA") began administrative forfeiture proceedings against the approximately \$25,490.00 in United States currency on the ground that the seized currency was used or intended to be used in exchange for controlled substances or was proceeds of trafficking in controlled substances.

27. On or about July 27, 2023, Zashamonique Cain-Carter filed a claim with the DEA in the administrative forfeiture proceedings to the defendant approximately \$25,490.00 in United States currency.

Warrant for Arrest In Rem

28. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant property pursuant to 28 U.S.C. § 1335(d) and Supplemental Rule G(3)(c).

Claims for Relief

29. The plaintiff alleges and incorporates by reference the paragraphs above.

30. By the foregoing and other acts, the defendant property, approximately \$25,490.00 in United States currency, was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

31. The defendant approximately \$25,490.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 25th day of October, 2023.

Respectfully submitted,

GREGORY J. HAANSTAD
United States Attorney

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BRIDGET J. SCHOENBORN
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Verification

I, Brian Messerschmidt, hereby verify and declare under penalty of perjury that I am a Task Force Officer with the Drug Enforcement Administration (DEA) in Green Bay, Wisconsin, that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 8 through 25 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Task Force Officer with the DEA.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 10/24/2023

s/Brian J. Messerschmidt
Brian Messerschmidt
Task Force Officer
Drug Enforcement Administration